

27 January 2012

Greater Manchester Waste Disposal Authority (GMWDA)  
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**RE: Greater Manchester Waste Strategy Consultation**

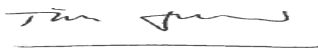
Dear Peter,

Thank you for providing the North London Waste Authority with the opportunity to respond to the Greater Manchester Waste Strategy Consultation.

The North London Waste Authority (NLWA) is the second largest waste disposal authority in England, handling 1 million tonnes of municipal solid waste (MSW) collected in the seven London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest.

The Authority's detailed response to your consultation is attached. This is an officer response, but we hope that you find this response, from another urban Waste Disposal Authority, a useful contribution to your consultation exercise. If you require any further clarification of the points raised in our response or have additional queries please do not hesitate to contact Kirsten Roberts ([kirsten.roberts@nlwa.gov.uk](mailto:kirsten.roberts@nlwa.gov.uk)) in the first instance.

Yours sincerely,



Tim Judson  
**Director of Procurement.**

**Question 1: What is your view of Zero Waste and do you think it can be realistically delivered?**

The concept of zero waste (i.e. where resources are cyclical and no waste is generated in the first place) should be aspired to. However, in practical reality the NLWA acknowledges that waste will be generated which requires management. This is in line with Defra's approach to achieving a zero waste economy in which *"material resources are re-used, recycled or recovered wherever possible, and only disposed of as the option of the very last resort"*.

From a communications perspective we have considered arguments for using 'zero waste' as a hard-hitting, easily understandable and aspirational strapline used already in the Wales waste strategy "Towards Zero Waste" and the Scottish "Zero Waste Plan". However, in north London we have opted not to use the term 'zero waste' within the title or objectives of our waste strategy. This is principally because we felt that:

- We already have significant challenges to reach our 50% recycling target by 2020 so this and diversion of waste from landfill tend to be the two key messages that we talk about when discussing the broad objectives of the north London joint waste strategy at present.
- Secondly, in line with WRAP research our approach to communicating prevention messages has been to focus on particular material streams e.g. Love Food, Hate Waste or reducing unwanted mail, rather than to promote a more generic message of 'zero waste'.
- Thirdly, there is an issue of timing for us as the Authority is in the process of procurement for long term waste management services and facilities our approach on communicating waste prevention messages or working towards zero waste to landfill may change over time. We are also in the process of seeking support for more joint communication work on waste prevention, so we would not consider developing a new message such as 'zero waste to landfill' or 'zero waste' at this moment in time.
- Lastly if Greater Manchester is considering using the term 'zero waste' within the context of its joint waste strategy we would suggest that there needs to be clarity regarding whether the term proposed is "zero waste" or "zero waste to landfill". The role and need for new waste management infrastructure can also usefully be incorporated into the latter.

We would also suggest that it would be helpful to recognise that local authorities can only influence the demand side aspects of waste prevention, rather than the supply side aspects which are the responsibility of producers. Accordingly it may be useful to consider how the shared responsibility for waste prevention is communicated as part of any overall campaign.

Having said all this we would suggest that a strapline such as 'Towards zero waste (to landfill)' could prove useful as an all encompassing slogan for the waste strategy as this incorporates both prevention and recycling and highlights the aspirational targets to which the constituent authorities are aspiring.

The NLWA seeks to reduce residual waste through re-use, recycling and composting and is currently listed 109 (out of 202 authorities) in the UK League Table for residual household waste per person (the amount remaining after waste sent for reuse, recycling and composting). The NLWA is committed to increasing recycling and composting performance from current levels, through existing and the development of new infrastructure. The NLWA believes that energy should be generated from waste that cannot be reused or recycled and has demonstrated this

through its procurement approach which intends to produce Solid Recovered Fuel (SRF) from the residual waste stream.

### **Question 2: Do you think these are suitable targets to deliver Zero Waste?**

The NLWA believes that developing waste reduction, recycling & composting and landfill diversion targets will assist in achieving GWMDA's zero waste vision.

#### **Waste Reduction:**

The NLWA acknowledges that targets for reduction need to be challenging enough to drive improvement and the 50% target to reduce residual waste (10% reduction in total tonnage) achieves this purpose.

The target seems reasonable, as long as it is supported by an appropriate level of effort on communications campaigns to impact on material demand and a supportive national framework to influence supply. As well as behavioural change, investment in infrastructure and action from the manufacturing industry will play a key role. Better design and material choice and focus on producer responsibility programmes will help influencing consumer behaviour.

#### **Recycling and Composting Rates:**

All analyses relating to collection systems suggest that a 50% recycling rate for an urban environment such as North London and Manchester is very challenging and can only be secured by maximising the contribution to recycling performance by significant enhancements to collection systems, increased communication work, significantly improving Household Waste and Recycling Centres (HWRCs), maximising the recycling of other streams such as mattresses, carpets and building materials and securing a further contribution to recycling performance from residual waste treatment arrangements/technologies.

The NLWA believes that achieving recycling targets of more than 50% without incurring excessive cost in an urban area such as London or Greater Manchester is questionable. In response to a London Assembly consultation<sup>1</sup> on why recycling rates vary so much across London, only two out of the four SJWDAs in London believe that the 50% recycling target is achievable (the NLWA was one of the two who believe the 50% target is achievable). Achievement of higher targets requires maximum participation in kerbside services, extensive communication, comprehensive networks of bring facilities and household waste recycling centres, diversion of green garden waste as well as extensive recycling of new material streams such as mattresses, MDF, building materials, carpets etc.

#### **Diversion from Landfill:**

The NLWA agrees with GMWDA's view on zero waste and that the target of achieving 90% diversion should be maintained and achieved. The Authority believes that beyond 2015 this target should be reviewed and increased above 90% if possible. For example, the London Plan sets out to achieve a target of 100% diversion (i.e. zero waste to landfill) by 2031. The NLWA supports this target.

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<sup>1</sup> London Assembly Environment Committee (2011) Waste not, want not – a review of why recycling rates vary across London. Available at: <http://www.london.gov.uk/publication/waste-not-want-not-review-why-recycling-rates-vary-across-london>

In addition, GMWDA could also take a view on any future proposed landfill bans for certain materials (such as wood, textiles and biodegradable material) and consider whether such bans would further increase landfill diversion.

### **Question 3: What are your views on the quantity vs quality recycling debate?**

The NLWA acknowledges that it is not possible or cost effective to recycle every type of waste. It can be argued that higher recycling rates could be achieved if a wider range of materials are collected at source. However, there is a cost to this that needs to be considered and practical considerations need to be taken into account, for example the amount of space required to source separate a wider range of materials. In north London there is a variety of collection systems in place with systems sometimes varying within a borough by housing type. Currently 6 out of 7 NLWA boroughs have some commingled material collections in place. The remaining borough is able to continue to use source separated material collection due to less densely populated areas.

It is not economically feasible to recycle some contaminated wastes. In some instances, increasing the amount of commingled materials collected may also not be viable because they may contaminate other materials in the stream. Therefore, a balanced approach needs to be taken to achieve the desired recycling rates whilst ensuring that the recyclates produced are of a high enough quality to be marketable.

Ideally recyclate will be closed loop or 'up cycled', ensuring that the highest carbon savings can be achieved. The current government consultation on the recovery and recycling targets for packaging waste for 2013 – 2017 recognises this fact with a proposal that the glass targets are split such that a cap is placed upon the amount of material that can be 'down cycled' into aggregate relative to the amount that is recycled back into new glass. The consultation document quotes a saving of 0.263 to 0.315 tonnes of CO<sub>2eq</sub> for each tonne of glass recycled into containers compared to a zero CO<sub>2eq</sub> saving for glass recycled into aggregates.

### **Question 4: How do you think we should encourage residents to participate?**

Helping residents identify how to reduce waste and at the same time save money, along with the associated environmental impact of waste, has always been a key message to encourage take up and less waste-producing behaviour patterns.

On the basis that regulatory and legislative strategies as well as voluntary agreements are occurring on a national and European level, we would recommend that on a local and regional level more action-oriented activities should occur focusing on informational, educational and promotional initiatives.

#### **Encouraging participation in prevention activities:**

Methods for provision of waste prevention information may include participation in public facing events, presentations, incentives such as competitions as well as interactive information portals. As waste prevention is not one behaviour, but many, there is a need for a 'package' approach combining a variety of measures and linked to waste prevention attitudes.

The NLWA has developed informational strategies to target each waste stream individually accompanied by easy-to-use instructions for residents. More extensive behavioural change campaigns have also been developed aiming to encourage residents try new activities that

break into routine habits. NLWA believes that the profile and visibility of waste prevention can be significantly raised by identifying specific activities that residents can actively participate.

Examples of how NLWA encouraged residents to participate in waste prevention activity in the last few years include:

- Delivery of Watch Your Waste Week in 2008 and 2009, a partnership project part of which involved Watch Your Waste Week Challenge, an activity where residents were encouraged to monitor their own waste production. Some of the impacts were 97.5 tonnes reduction in waste from the 125 households and 3 schools that took part in the Challenge to reduce their waste for a week and an average 50% reduction in waste to disposal from residents taking part.
- Love Food Hate Waste in 2009 which involved extensive outreach activity. More than 260 events were delivered by NLWA and the seven partner authorities during the campaign. Extensive advertising was also undertaken including 56 press adverts, 7 advertorials, 30 bus back adverts, 4 billboard posters and 58 bus stop adverts. The campaign additionally resulted in positive news articles appearing in eight publications. More than 3,500 people were directly engaged through the outreach programme and the resulting Opportunities-To-See through press and advertising were in excess of 17 million.
- NLWA supported the pilot edition of the European Week for Waste Reduction in November 2008 and the first official edition in November 2009 by organising and delivering a number of awareness raising initiatives. NLWA's participation in the European Week for Waste Reduction in 2010 and 2011 included notable successes such as direct engagement with 3,000 people.
- Attendance at summer events across all seven constituent boroughs to promote the Love Food Hate Waste message alongside delivery of events at supermarkets and shopping centres.
- Delivery of a waste minimising cooking demonstrations for residents and catering students.
- Textiles workshops to help people extend the life of their clothes by teaching basic mending, adjusting and remaking skills.
- 1,500 secondary school students attended assemblies and workshops and were then invited to take part in a competition to create a poster which conveyed their thoughts on waste prevention. The winning posters were displayed on buses across north London.
- In 2011 a series of Great Taste Less Waste performances were held in 21 primary schools with the participation of 14,000 pupils.
- Production of a 'No Junk Mail' guide for residents that promoted junk mail opt-outs such as the Mailing Preference Service and the Royal Mail Opt-out scheme.
- Delivery of 14 Give and Take Days (two events per constituent borough).

More details on NLWA's waste prevention activity can be found at the dedicated 'Residents' section of the NLWA website at <http://www.nlwa.gov.uk/waste-resources/residents> and the Love Food Hate Waste micro-site at <http://lfhw.nlwa.gov.uk/lfhw/>.

## **Encouraging participation in recycling:**

There is a considerable amount of guidance on encouraging greater participation in recycling available from WRAP including their toolkit on designing communications approaches which is based upon authorities inputting data about existing services to identify areas for focus and development.<sup>2</sup>

Accordingly the authorities in north London have adopted many of the approaches developed and tested by others including face-to-face communication through doorstepping, events and presentations; broad brush communication including bus back and side advertising, billboard and poster advertising, advertising in local papers and PR. We have tended to avoid other broad brush initiatives such as regional radio and TV on the basis that these are best used on a pan-London basis to avoid north London communicating with householders not resident in our area. However, the Recycle for London campaign has used regional radio, London underground poster advertising and social media to communicate broader messages to encourage participation. The latest Recycle for London campaign 'Nice Save' focussed on the financial savings made from recycling with the pan-London campaign promoting a generic London-wide saving and individual authorities, should they so wish, promoting the savings made in their local area as a result of public participation in recycling in the past year.

However, before any communication campaign to encourage greater participation in recycling is initiated, it is necessary to assess whether all the practical aspects of the service that might increase participation in recycling have been used. Accordingly in north London a service review is currently being undertaken to assess whether all that can be done on the service to increase participation in food waste recycling has been exhausted, prior to developing proposals for a pan-north London food waste recycling campaign to encourage greater participation. Pre and post campaign participation monitoring is proposed along with tonnage recording.

## **Question 5: How do you think the community sector can help to deliver zero waste?**

Objective 4.C1 of the North London Joint Waste Strategy states that '*The Partner Authorities will continue to actively support the development of best practice in waste reuse and will encourage the development of community sector and other partnerships to deliver effective reuse services*' and Objective 4.C2 states that '*The Partner Authorities will continue to support bids for external funding of reuse services and will seek to develop a means of rewarding effective reuse services directly through a reuse "credit", to reflect the avoided or deferred cost of disposal*'.

Furthermore, the third sector has been identified one the key stakeholders for the effective delivery of the NLWA's Waste Prevention Plan with their contribution being vital for the development of reuse activities.

It is evident that third sector channels achieve higher reuse rates compared to the bulky material that is channelled through local authority collections and HWRCs. According to Defra's Household Waste Prevention Evidence Review published in June 2009 which assessed policy-relevant evidence for reduction in the amount of waste generated, material collected from third sector organisations is also of higher value and quality as opposed to local authority collections that mainly collect low quality bulky waste.

The reuse sector could also effectively be developed by supporting some of the existing networks that exist for reuse services other than furniture. In particular, support for online reuse

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<sup>2</sup> WRAP (2008) Improving Low Participation Areas- Effective Communications Planning Guidance. Available at: [http://www.wrap.org.uk/local\\_authorities/research\\_guidance/communications/low\\_participation\\_areas/index.html](http://www.wrap.org.uk/local_authorities/research_guidance/communications/low_participation_areas/index.html)

networks such as Freegle and Freecycle would be beneficial as would promotional support for accredited repair and reuse centres.

There are a number of social benefits associated with the third sector although the NLWA is a single purpose authority with a responsibility to dispose of waste collected by the seven constituent boroughs. Any decisions made by Members must demonstrably focus on achieving that reduction in weight and as such, chosen activities focus on benefits to the NLWA with regards to tonnage diversion.

Please see examples below of the work NLWA has delivered in partnership with the third sector.

- The NLWA produced a leaflet listing all community based reuse services in north London. The leaflets were distributed at events to residents looking for low-cost large household item, or have items to donate and were also given to borough call centres.
- In 2010 we worked with the charity TRAIID (Textile Recycling for Aid and International Development) for the delivery of a 'Sew Good' workshop to help people extend the life of their clothes by teaching basic mending, adjusting and remaking skills.
- In 2010, ecoACTIVE delivered a series of school workshops on behalf of the Authority and its constituent boroughs.
- In 2011 we worked with Waste Watch for the delivery of 14 Give and Take days across north London. As part of this project the Authority worked with Bright Sparks who also attended and delivered the PAT testing for all 14 events.
- NLWA is member of the London Environmental Education Forum (LEEF), a networking organisation that aims to support, facilitate and promote environmental education across London.
- Finally, the Authority has worked with the London Community Resource Network (LCRN) on a number of projects, including:
  - Two 'Collaboration for Growth' events in June and November 2010 with the aim of improving the environmental performance of Housing Associations by working with local reuse organisations;
  - 'Waste Diversion with Providers of Housing Services project. The aim was to expand relationships within the housing sector and increase diversion of bulky items from the waste stream through reuse and recycling by developing partnerships and contracts; and
  - Home composting with advice and compost giveaways to encourage uptake and sustainable use of home composting bins.

Details of the above projects can be found at <http://www.nlwa.gov.uk/waste-resources/residents/reuse>.

Finally, the NLWA continues to support charities and other third sector organisations by paying Reuse and Recycling Credits for waste that is diverted from landfill by these organisations. In 2010-11, £145,000 was paid in reuse and recycling credits to 14 organisations and 2,472 tonnes were diverted as a result of the scheme.

**Question 6: What are your views on the best way to assess and monitor that environmental protection is being improved?**

The Authority agrees that life-cycle tools should be adopted to continually assess the environmental performance of services. However, different calculation methodologies for CO<sub>2eq</sub> make quite considerable differences to the outcomes of the calculations. Recognised tools such as the EA's WRATE and SEPA's Carbon Metric can all be used to model environmental performance. The GLA has also developed an Emissions Performance Standard (EPS) and Carbon Intensity Floor (CIF). Comparison of performance against such targets could also be reviewed and the NLWA suggests that the GMWDA considers developing such targets. The NLWA commends the move towards carbon-based outcomes and acknowledges that the EPS and the CIF are innovative approaches to the way waste arisings are managed in the future. Selecting priority materials for appropriate management will also be critical to ensure carbon targets are achieved.

In north London we also use the Strategic Environmental Assessment (SEA) of the North London Joint Waste Strategy as a basis for setting out the monitoring framework for environmental improvements resulting from the strategy implementation over time, over and above any statutory reporting carried out now or in the future e.g. through WasteDataFlow or the EPS in the future. Whilst we don't yet report on all of the indicators outlined in the SEA because some of the indicators relate to the design, development and operation of new waste management facilities, the framework is in place to measure impact in the future. We produce an annual monitoring report in line with SEA Regulations guidance which is available on our website at [www.nlwa.gov.uk/annual-monitoring-reports](http://www.nlwa.gov.uk/annual-monitoring-reports).

Whilst this is not something we do in north London, another approach might be to establish an independent environmental committee which regularly reviews ongoing environmental protection. This committee could perhaps link in to local site liaison committees or school groups who might be interested in the environmental protection performance of individual sites and facilities.

**Question 7: What role do you think local authorities can play in promoting more sustainable business practices?**

Local authorities can provide a role in promoting more sustainable business practices, for example, through providing advice and guides to face to face support and providing collection and treatment services if appropriate.

In the NLWA's experience, businesses need support in terms of:

- Information on the business case for waste prevention – this is essential to ensure everyone in the organisation understands the benefits of taking action;
- Relevant advice on 'how to start';
- Access to experts who can provide advice and support and signposting to the same;
- Examples or case studies of businesses similar to their own that have successfully reduced their waste and their costs as a result;
- Advice on how to measure the impact of their actions; and

- Recognition and/or peer group contact to maintain the momentum and motivation that's been started.

The NLWA and its seven constituent boroughs provide a business waste prevention guide which is revised on an annual basis and is available free of charge from the Authority's website at <http://www.nlwa.gov.uk/waste-resources/businesses/free-guide-to-waste-prevention>. This provides top tips for three types of small business common in North London, namely offices, restaurants and take-aways and shops, but it also provides contact details for support services, tips on how to start and additionally advice on how to monitor progress in the longer term. It also includes cases studies of local businesses that have successfully reduced their business waste. The NLWA has also produced a series of posters for retailers, restaurants and offices encouraging waste prevention and they are available at <http://www.nlwa.gov.uk/waste-resources/businesses/free-posters-for-your-business>.

Additionally, the Authority provided briefing sessions to constituent borough Trade Waste Officers in order to inform them of the supporting material available to local businesses to reduce their waste, investigate the level and type of support businesses need and look into partnership opportunities.

The other type of support that the Authority has provided in the past to encourage small businesses to participate in waste prevention actions is face-to-face support in the form of a person coming in to the business (small shops in North London's case), encouraging them to participate in a waste prevention initiative and then supplying merchandise (reusable bags) and putting up posters in the shop in recognition that the business is encouraging waste prevention through a range of measures including the promotion of reusable shopping bags.

The NLWA believes that it would also be effective for local authorities to focus upon particular sub-sets of businesses within their area with which to promote the financial and commercial value of resource efficient business. Either a geographic or sector specific approach could be taken. From a sector specific perspective, food waste producing and hospitality businesses should be a principal target as food waste is high in biomass content and if landfilled is a relatively powerful landfill gas producer and therefore a sector and waste with relatively high climate change impact potential.

**Question 8: Do you think that there is a demand for local authority facilitated business waste recycling collections, or trade waste recycling facilities?**

A key issue for local authorities providing such a service is whether there are sufficient economies of scale, i.e. sufficient small businesses within the same area to whom they can provide a cost effective service. If businesses requesting a service are scattered across the area, then it may not be viable to provide a separate service. Co-collections of business and household waste can work, but robust systems of measurement need to be put in place to ensure that estimates of the amount of 'trade' and household waste are as robust as possible.

There is particular encouragement to local authorities to assist businesses, especially small to medium enterprises (SMEs) in undertaking their waste management activities. There is much talk in the waste industry of the need for investment in new waste treatment capacity for C& I Waste, but delivery is proving to be challenging, largely due to planning and financing barriers. Therefore, there is particular encouragement to local authorities to allow businesses to use existing and proposed local authority infrastructure. By addressing C&I waste there is an opportunity for the local authority to usefully contribute to an improved environmental performance for the sub-region in a way that is consistent with your function and benefits the competitiveness of the local authority. However, it is important that the local authority is not

overstretched in a way that threatens the delivery of their primary tasks; managing the municipal waste stream and securing value-for-money for local taxpayers.

One of the often quoted examples of constructive work that local authorities can undertake to support local business waste management, especially that produced by SME's, is access to HWRC facilities. Traditionally, local authorities have sought to avoid taking in C&I waste this way because it may increase use of sites which can be busy at key times, the local authorities may end up subsidising C&I waste disposal, and because it increases pressure for additional sites.

However, at a time when waste at HWRCs may be decreasing and some HWRCs risk the threat of closure, there is perhaps an opportunity to cater for business waste customers as well as householders, with C&I waste being subject to charging that may assist in the overall cost of the service provision.

**Question 9:**

The NLWA does not have any other comments